



MCI Communications Corporation

1801 Pennsylvania Avenue, NW
Washington, DC 20006
202 887 2375

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Kimberly M. Kirby
Senior Manager
FCC Affairs

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June 3, 1997

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: Ex Parte Presentation in CC Docket No. 97-137

Dear Mr. Caton:

On Monday, June 2, 1997, Joan Campion (MCI), Carl Giesy (MCI), Susan Jin Davis (MCI), Dick Powell (MCI), Ali Miller (MCI), Penn Gaines (MCI), Sue Platner, representing MCI, Scott Barash, representing MCI, Karen Reidy (MCI), and the undersigned, met with Don Stockdale (CCB), Rob Tanner (CCB), Sarah Whitesell (CCB), Melissa Waksman (CCB), Jordan Goldstein (CCB), David Ellen (CCB), Brent Olson (CCB), and Tom Koutsky (OGC). The purpose of the meeting was to discuss MCI's position with respect to Unbundled Local Switching and the OSS issues related to Unbundled Network Elements and resale; an overview of MCI's presentation to the Department of Justice on May 21, 1997 covering similar issues; and a proposed timeline for Issue 7 implementation. The attached documents briefly outline the topics discussed and therefore will not count against MCI's page limit in this proceeding.

Also attached is a copy of the transcript from the Illinois 271 case (In The Matter of: ILLINOIS COMMERCE COMMISSION On Its Own Motion Investigation concerning Illinois Bell Telephone Company compliance with Section 271(C) of the Telecommunications Act, No. 96-0404, May 6, 1997). This document was requested by staff and will not count against MCI's page limit in this proceeding.

Please file the attached documents as part of the record in the above-captioned proceeding, including a corrected version of the slides detailing unbundled local switching. Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Kimberly M. Kirby

Kimberly M. Kirby

No. of Copies rec'd 0+2
List ABOVE

Attachments

cc: Richard Metzger (Ltr. and presentation only)
John Nakahata (Ltr. and presentation only)
Jim Casserly (Ltr. and presentation only)
Rudy Baca (Ltr. and presentation only)
Tom Boasberg (Ltr. and presentation only)
Don Stockdale (Ltr. and corrected slides only)
Rob Tanner (Ltr. and corrected slides only)
Sarah Whitesell (Ltr. and corrected slides only)
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Brent Olson (Ltr. and corrected slides only)

**Ex Parte Presentation In
CC Docket No. 97-137**



MCI Communications Corporation

June 2, 1997



Ameritech - Michigan Section 271 Application Is Deficient

■ No Unbundled Local Switching

■ Lack Of Electronic Interfaces

- Unbundled Network Elements
- Resale

■ State Commissions Conclude Ameritech's OSS Deficient

- Wisconsin
- Illinois
 - Staff Initial Comments
 - AT&T Cross Of Anderson Consultant

Unbundled Local Switching (ULS): What Is It And Why Is It Critical

■ Facilities-Based Approach To Offering Local Service

- Line Port
- Switching On The “Switching Matrix”
- Trunk Port
- All Features/Functions Of The Switch

■ Critical Means Of Providing Local Service

- Cannot Hope To Replicate Ameritech’s Switches
- Integration Of Service Delivery Types

ILEC Unbundled Local Switching ULS Is *Not* Platform

■ CLEC Still Needs To Provide:

- Loop
- Interoffice Transport (To Tandems, E911 PSATs, OS/DA, IXCs, CLECs, ILECs, Voicemail, etc.....)

■ ILEC “ULS” Gives CLECs The Option To:

- Purchase Loop/Transport From ILEC (And Combine With ILEC “ULS”)
- Purchase Loop/Transport From 3PTY (And Combine With ILEC “ULS”)

ULS - Network Interface Device - (NID)

Unbundled Local Switching Elements

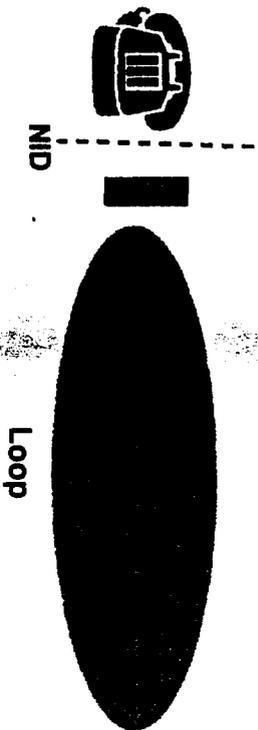


Definition of Elements

(NID) is a device that connects a customer's telephone to the public switched telephone network (PSTN) and is located at the customer's premises.

ULS - Loop

Unbundled Local Switching Elements

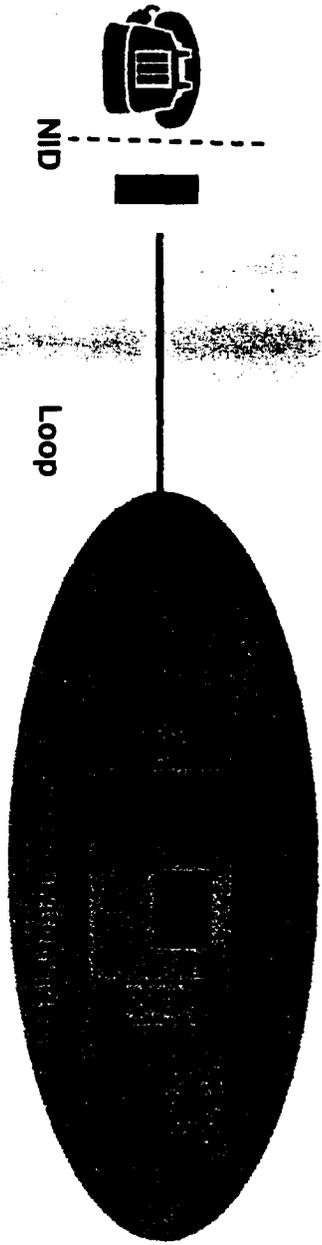


Definition of Elements

- **NID: Establishes the Network Demarcation Point Between a Carrier and its Subscriber**

ULS - Local Switching

Unbundled Local Switching Elements



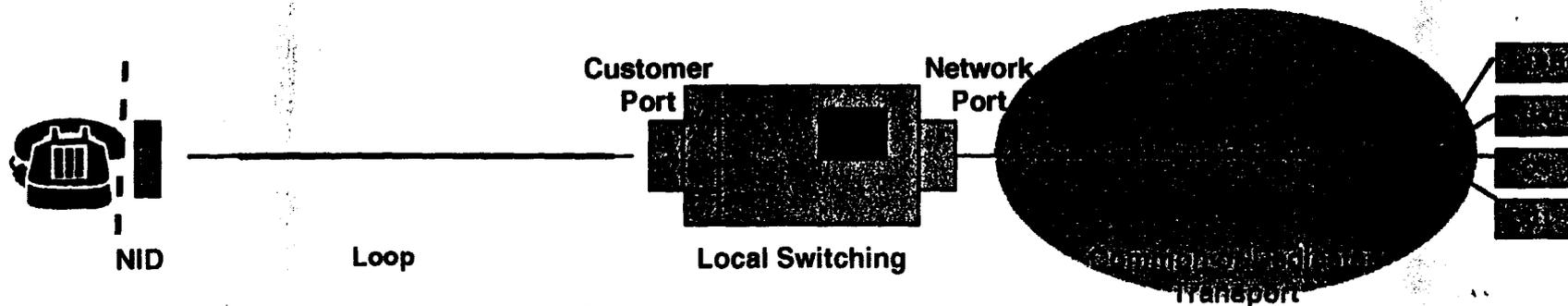
Definition of Elements

- **NID: Establishes the Network Demarcation Point Between a Carrier and its Subscriber**
- **Loop: Transmission Facility between the NID and the Main Distribution Frame**



ULS - Transport

Unbundled Local Switching Elements

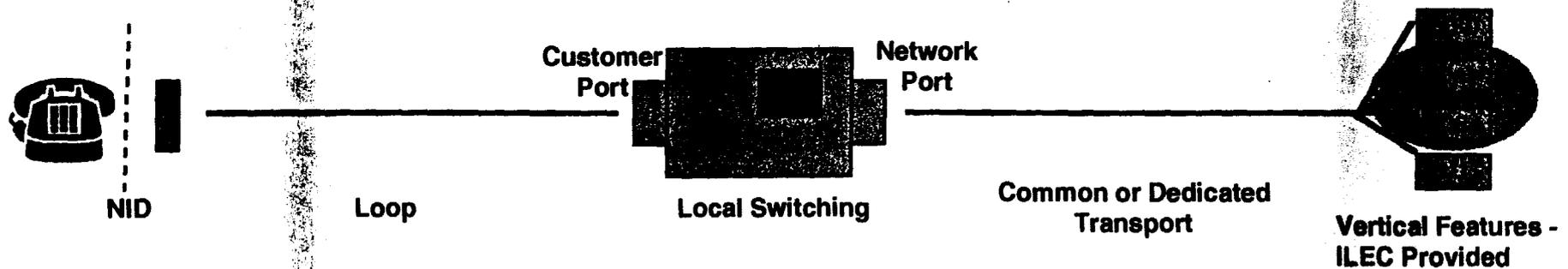


Definition of Elements

- **NID:** Establishes the Network Demarcation Point Between a Carrier and its Subscriber
- **Loop:** Transmission Facility between the NID and the Main Distribution Frame
- **Local Switching** Connects the Appropriate Originating Lines or Trunks to a Desired Terminating Lines or Trunks

ULS - Operator Services And Directory Assistance

Unbundled Local Switching Elements

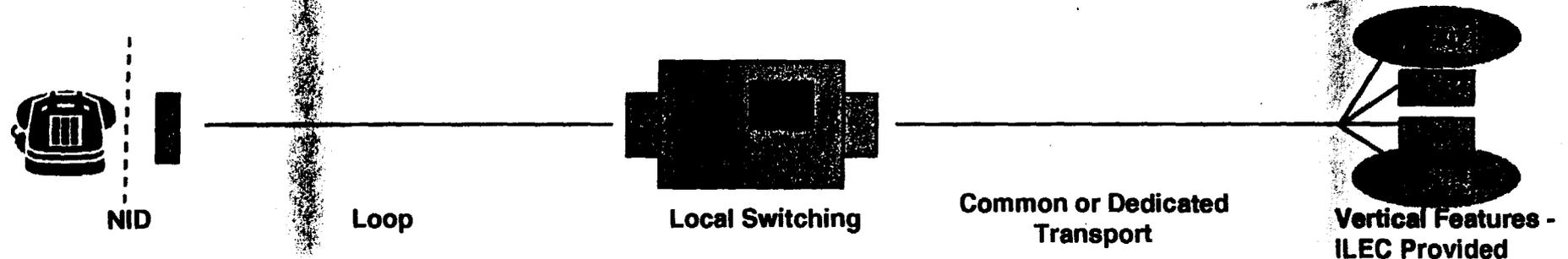


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- **Transport**
 - **Common**: Interoffice Transmission Path Between ILEC Network Elements
 - **Dedicated**: Interoffice Transmission Path Between ILEC and MCI (or Third Party) Designated Locations

ULS - Signalling

Unbundled Local Switching Elements



Definition Of Elements

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 - **Common:** Interoffice Transmission Path Between ILEC Network Elements
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- **DA:** Provides Local Customers Telephone Number Listings
- **OS:** Provides Operator and Automated Call Handling, Toll, and Special Services

Ameritech's ULS Is Untested

■ Ameritech Has Not Even Offered "ULS" Until Recently

- Prior "Port" Tariffs Were Not "ULS"
- Ameritech Has Refused To test Without Interconnection Agreements
- Ameritech Insisting On Cumbersome BFR Process Now

Ameritech's ULS Is Patently Deficient

■ Ameritech "ULS" Proposed Pricing Problematic

- Contrary To Cost Causation Principles
Ameritech Prices "ULS" With A Usage Sensitive Element
- Double Cost Recovery
- Ridiculous And Ambiguous NRCs

Ameritech's ULS Patently Deficient (Cont'd)

■ AIT's "ULS" Offering Not Consistent With Network-Based Approach

- CLEC Can Use "ULS" Only To Originate Traffic
- Ameritech Continues To Grab Terminating Switched Access Revenue
- Ameritech Has Not Worked Out Significant Issues (e.g....., Customized Routing, Numbering, Interconnection Issues, Ordering and Provisioning)
- Ameritech Refused To Offer Common Transport

OSS For Unbundled Network Elements Do Not Support Fully Entry

- **OSS for UNEs are even further away from operational readiness than Resale:**
 - More complicated than Resale
 - Most of Ameritech's Interfaces for UNEs Have Never Been Used

Amertech's OSS Has Not Been Put To Actual, Competitive Use

■ Unbundled Network Elements Is More Complicated Process

■ It's Too Early To Tell:

- 1/3 Requests OSS Information to Support Loop Ordering.**
- 1/27 First Formal Request for Loops.**
- 2/2 Requested to Move Forward Without an Agreement.**
- 3/7 Meeting - AIT Insists on Approved Contract Before Testing.**
- 3/31 Summary of MCI Requirements for OSS.**
- 4/10 Illinois 271 Document Provides MCI With Unbundled Services Ordering.**
- 5/1 Placed Two (2) Recombination Orders manually.**
- 5/20 Meeting - Reviewed Specific Requirements for 30 day trial of 2 UNE combinations**
- 5/23 Bonafide request for complex UNE combinations**

Ameritech's OSS For Unbundled Elements Do Not Support Full Entry

■ Ameritech's OSS Have Missing Functionalities

- Standard interfaces not available for many of business processes

■ Ameritech's OSS Are Non-Standard

- Different Processes for Unbundled Loops v. Other Network Elements
 - Single Loop Order Requires Use of ASR (Non-Standard)
 - Only RBOC That Insists On Using ASR For Loops
 - Loop orders with Interim Local Number Portability must be ordered via 2 different processes

Ameritech's OSS For Unbundled Elements Do Not Support Full Entry (Cont'd)

- **Call Databases, OS/DA Ordered Through Manual Processes**
- **Most Interfaces Have Not Been Actually Used**
 - Over half of interfaces are not in actual Use (See Ameritech Schedule 3, Function/Product Test Matrix)

Ameritech's Planned OSS Interface For UNEs Versus The Industry Standard

Process	Capabilities	Current Interface Offered	OSS Plan Alignment	AIT Ready date for industry standard	Comments
Preordering	SAG, Features, PIC Availability			now	Desired interface available
	TN, DD, CSR for loops			TBD	AIT provides non-standard. Industry standards under development.
	TN, DD, CSR for UNEs			TBD	
Ordering	Loops/Ports			TBD	AIT offers ASR interface. Industry standard is LSR
	NID			TBD	Industry standards under development. No information available on AIT's interface.
	Number Portability w/unbundled loops			TBD	ILNP available via EDI. Must order ILNP combinations with loops via 2 difference processes (EDI and ASR)
	Switching end user			-4Q97	AIT provides desired EDI 5.0 - want 7.0. Migration plan under development.
	Footprint switching			TBD	Manual forms from AIT.
	Transport			TBD	AIT offers ASR interface. Industry standard is ASR issue
	Signaling			TBD	AIT offers ASR interface. Industry standard under development
	OS			TBD	AIT offers a manual interface
	DA			TBD	AIT offers a manual interface
Provisioning	FOC loops			TBD	AIT offers ASR interface. Industry standard is LSR
	FOC UNEs			TBD	AIT offers ASR interface. Industry standard is LSR
	Status			TBD	AIT offers only a manual interface
	Completion			TBD	AIT offers only a manual interface
Maintenance	Trouble entry, status, completions			now	Desired interface available, but not tested
Billing	Usage End User			TBD	
	Usage Access			now	Desired interface available
	Telco Bill			now	Desired interface available

-  Manual process
-  Interim, non-standard mechanized solution in place
-  Long term solution provided

Function / Product Test Matrix

Product Group	Pre-Ordering (EDI)					Ordering & Provisioning (EDI & ASR)							Repair & Maintenance				Billing & Usage			
	Customer Service Record Retrieval	Street Address Validation Guide Aid	Central Office Feature Availability	Telephone Number Selection	Due Date Negotiation	Assuming an Account "As Is"	Assuming an Account "As Specified"	Disconnect an Account/Service	New Account/Service	Changing an Account/Service	Firm Order Commitment/Acknowledgment	Order Completion	Proactive Jeopardy Notification	Trouble Report Creation	Trouble Report Information Request	Trouble Report Submission Update	Proactive Status Notification	Monthly Bill	Monthly Electronic Bill	Daily Usage Feed (MIF)
Resale	1,2,3	1,3	1,3	2,3	2,3	1,2,3	1,2,3	1,2,3	1,2,3	1,2,3	1,2,3	1,3					1,3	1,3	1	
UB-Local Switching-Line Ports	1,2,3	1,3	1,3																	1
Service Provider Number Portability	1,2,3																			
UB-End Office Integration EOI								1,3	1,3	1,3	1,3						1,3	1,3		
UB-LOOPS	1,2,3	1,3						1,3	1,3	1,3	1,3						1,3	1,3		
UB-Local Switching-Trunk Port																				
UB-Tandem Switching																				
UB-Local Transport								1,3												

1	Actual use
2	Carrier to carrier test
3	Internal test

° Activity limited to PPS - Ameritech Payphone Services and only for resale product groups.

Certain pre-ordering, repair & maintenance, and daily usage feed functions operate the same for multiple product groups. Test and actual use information within the matrix for these functions are shown once and replicated for other relevant product groups.

Ameritech's Resale OSS Are Not Operationally Ready

■ Ameritech's OSS Is Unable to Process Complex Resale Orders

- Cannot Order ISDN, Centrex, Private Lines, Frame Relay Service

■ Unnecessary Manual Intervention

Ameritech's Resale OSS Are Not Operationally Ready (Cont'd)

■ **Difficulty Obtaining Information On Interfaces and Procedures**

- Limited Information Given Upfront (8/96-12/96)
- Ameritech Delayed Meetings with MCI To Obtain More Detail
- Resale Services Ordering Guide Given to MCI Regulatory Attorney in 4/97

Ameritech's Resale USS Are Not Operationally Ready (Cont'd)

- **Coding By Reject Analysis: Learning Through Errors**

- **Operational Problems Have Not Been Resolved**
 - Double billing
 - High Number of Rejects
 - Backlog of Orders

Examples Of Double Billing

- 12/5/96 - AIT notified MCI that retail unit still had visibility to end-user account after completion notice sent to MCI on 12/02/96. AIT knew order errored out in billing process due to system bug
- 12/19/96 - Test orders finally make it through AIT billing system. AIT tables improperly updated. Took 2 weeks to find error and fully correct.
- 2/6/97 - MCI alerts AIT of double billing problem. AIT confirms this could be a problem.
- 4/26/97 - Reporting requirements submitted to AIT to help MCI monitor situation. No response or reports.
- 5/13/97 - Letter sent to MCI outlining action plan to help double billing issue